

Exhibit 6

to

*Declaration of George B. Henderson, II Submitting Exhibits
In Opposition to the Roxane Defendants'
Motion for a Finding of Spoliation and for Sanctions*



U.S. Department of Justice

*United States Attorney
District of Massachusetts*

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Boston, Massachusetts 02210

April 13, 2007

Helen E. Witt, Esq.
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Kirkland & Ellis LLP
200 E. Randolph Dr.
Chicago, IL 60601

Re: United States of America ex rel. Ven-a-Care of the Florida Keys,
Inc., v. Boehringer Ingelheim Corp., et al., Civil Action No. 07-
10248-PBS, MDL 1456

Dear Helen:

Enclosed please find 48 CD-ROMs containing electronic copies of the following materials:

1. Department of Health & Human Services documents contained on the CD-ROMs labeled as below. A set of these CD-ROMs with images and OCR in Summation and electronic format accompany these initial disclosures. The following documents represent 26,151 pages.

<u>CD Volume Name</u>	<u>No. of Pages</u>	<u>Source</u>
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• HHSCD001	2,224	CMS Central Office, Vol. 1 of 1
• HHSCD002	533	CMS Region I, Vol. 1 of 1
• HHSCD003	1,034	CMS Region III, Vol. 1 of 1
• HHSCD004	279	CMS Region IV, Vol. 1 of 1
• HHSCD005	1,974	CMS Region V, Vol. 1 of 1
• HHSCD006	4,168	CMS Region VI, Vol. 1 of 1
• HHSCD007	83	CMS Region VII, Vol. 1 of 1
• HHSCD008	3,368	CMS Region VIII, Vol. 1 of 1
• HHSCD009	4,700	CMS Region IX, Vol. 1 of 1
• HHSCD010	2,364	CMS Region X, Vol. 1 of 1

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● HHSCD011	772	Various HHS Offices, Vol. 1 of 1
● HHSCD012	290	CMS Region II, Vol. 1 of 1
● HHSCD013	480	Various HHS Offices, Vol. 1 of 1
● HHSCD014	2	CMS Central Office, Vol. 1 of 1
● HHSCD015	72	CMS Region II, Vol. 1 of 1
 HHS Electronic		
● HHSCD101	3,808	CMS Region VI, Vol. 1 of 1

2. Material obtained from various identified corporations contracted to act as Medicare carriers, contained on CD-ROMs labeled as follows. A set of these CD-ROMs with images and OCR in Summation and Electronic format accompany these initial disclosures. The following documents represent 95,349 pages.

<u>CD Volume Name</u>	<u>No. of Pages</u>	<u>Source</u>
● AWPCD001	8,377	Adminastar Federal, Vol. 1 of 2
● AWPCD002	7,148	Adminastar Federal, Vol. 2 of 2
● AWPCD003	9,775	BC & BS of Alabama, Vol. 1 of 1
● AWPCD004	1,169	BC & BS of Arkansas, Vol. 1 of 1
● AWPCD005	3,200	BC & BS of Florida, Vol. 1 of 1
● AWPCD006	2,741	BC & BS of Kansas, Vol. 1 of 1
● AWPCD007	98	BC & BS of Montana, Vol. 1 of 1
● AWPCD008	7,952	Cigna, Vol. 1 of 2
● AWPCD009	6,383	Cigna, Vol. 2 of 2
● AWPCD010	279	Empire Healthchoice, Vol. 1 of 1
● AWPCD011	116	Group Health Incorporated, Vol. 1 of 1
● AWPCD012	5,106	Healthnow, Vol. 1 of 1
● AWPCD013	1,090	Highmark, Vol. 1 of 1
● AWPCD014	8,924	NHIC, Vol. 1 of 2
● AWPCD015	9,404	NHIC, Vol. 2 of 2
● AWPCD016	839	Noridian, Vol. 1 of 1
● AWPCD017	3,975	PalmettoGBS, Vol. 1 of 1
● AWPCD018	465	Regence BC & BS of Utah, Vol. 1 of 1
● AWPCD019	10	Triple S, Vol. 1 of 1
● AWPCD020	8,140	Trailblazer Health Systems, Vol. 1 of 2
● AWPCD021	4,754	Trailblazer Health Systems, Vol. 2 of 2
● AWPCD022	1,863	Wisconsin Physician Services, Vol. 1 of 1

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● AWP023	526	Various Carriers, Vol. 1 of 1
● AWP024	20	Various Carriers, Vol. 1 of 1
Carrier Electronic		
● AWP101	1,441	Adminastar Federal, Vol. 1 of 1
● AWP102	13	BC & BS of Alabama, Vol. 1 of 1
● AWP103	45	BC & BS of Montana, Vol. 1 of 1
● AWP104	63	Cigna, Vol. 1 of 1
● AWP105	505	Healthnow NY, Vol. 1 of 1
● AWP106	197	NHIC, Vol. 1 of 1
● AWP107	728	Palmetto GBA, Vol. 1 of 1
● AWP108	3	Trailblazer Health Systems, Vol. 1 of 1

Some of the information contained on these CD-ROMs may have been marked "CONFIDENTIAL." Some of the information on these CD-ROMs may contain Confidential Health Information. Any such information is subject to the following protective orders: (1) the Stipulated Protective Order Governing Confidential Health Information dated June 8, 2004, in MDL No. 1456; and (2) the Protective Order dated December 13, 2002, in MDL No. 1456, as amended.

In addition, enclosed please find a carrier privileged documents log and HHS privileged documents log. Also, enclosed is a source list for production for the following CDs: HHSCD011; HHSCD013; AWP023 and AWP024.

Should you have any questions, please contact me by phone at (617) 748-3272 or E-mail at George.Henderson@usdoj.gov.

Sincerely,



George B. Henderson, II
Assistant U.S. Attorney

enc.

cc: Richard Goldstein, Esq. (w/o encl.)
James Breen, Esq. (w/o encl.)
Laurie Oberembt, Esq. (w/o enc.)